

**PSPA**  
**PACIFIC SEAFOOD PROCESSORS ASSOCIATION**  
**Est. 1914**

November, 2011

**POSITION ON THE PEBBLE MINE PROJECT**

The Pacific Seafood Processors Association (PSPA) represents seafood processing companies operating throughout coastal Alaska. These companies have invested millions of dollars in seafood facilities in Alaska and annually provide markets to thousands of fishermen and jobs to thousands of processing workers. They generate significant economic benefits to communities and the state and supply high quality seafood products to consumers around the world. A number of our member companies have large salmon processing operations in Bristol Bay, some of which have been in operation for 100 years.

The viability of Alaska's seafood industry is based upon the productivity of Alaska's unspoiled waters. Those waters, and the fisheries that depend on them, have provided an economic base for much of Alaska, and premium seafood to the world, for over a century. If well-managed and protected, they will continue to do so in perpetuity.

Alaska's seafood industry has invested heavily over the past three decades in specifically marketing our products as pure and healthful and coming from the most pristine waters on Earth. Thus, along with the actual purity and productivity of Alaska's waters, this public perception plays a critical role in the marketability of Alaska's seafood.

PSPA recognizes the importance of economic diversification and resource development in Alaska. The Association and its member companies are supportive of resource development projects when and where there is a reasonable level of certainty they can be developed, operated, and concluded without damage to Alaska's ecosystems, fishery resources, and the market perception of the health benefits, purity, and wholesomeness of Alaska's seafood. It is critically important that any potential shorter-term benefits from extraction of non-renewable resources always be carefully weighed against any potential short and long-term negative impacts on perpetually renewable resources, such as fish and the waters and habitat upon which they depend.

In 2007, when it was anticipated that the Pebble project would undertake the mine permitting process within a year, the PSPA Board of Directors released a position paper that spoke to its views of the Pebble project. At that time, the board was generally supportive of allowing the project to proceed in the exploration, scientific research, and permit application processes, but noted that, "Due to its location in one of the richest fishery resource areas of the world, applying a strict benefit/risk test for this large-scale hard rock mining project is especially appropriate." The paper expressed deep concern that the project appeared to pose an unacceptably high risk of degrading important watersheds feeding the world's most productive sockeye salmon fishery. It went on to state that, "PSPA would oppose the Pebble Mine project

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unless the developer can ensure that there will be no negative impacts to the region's water quality or to Alaska's fishery resources and their marketability."

In the four years since issuing that initial statement, we have carefully followed the progress of the Pebble project and considered available information about this and other large mine projects and the particular geographical, geological, ecological, hydrological, socio-economic, and cultural attributes of the region. Regretfully, we have concluded that the level of risk posed by the Pebble mine is simply too high. While we acknowledge the potential short-term economic benefits of this enormous project, we can see no way that it can be developed, operated, and concluded without – at some point – causing irreparable harm to the watersheds, ecosystems, fishery resources, businesses, people, and communities of the region. Furthermore, we know from past experience, that actual or perceived damage to the purity of the waters or fish of the Bristol Bay region would harm the marketability of Alaska salmon and other seafood species, even from other regions of the state.

PSPA is an industry trade association that has been in active existence since 1914. In all those years, the Association has not taken a position in opposition to any specific development project or category of projects of other natural resource industries. Doing so now is not a decision our Association takes lightly. While, after careful consideration, we are compelled to oppose development of the Pebble mine project due to its unique location, size, and potential harm, we look forward to continuing to work cooperatively with all Alaska industries on matters of mutual interest and to supporting projects that can ensure no negative impact on fishery resources or the marketability of Alaska seafood.